

REMARKS

Applicants appreciate the thorough examination of the present application as evidenced by the Office Action and the indication of allowable subject matter in Claims 56-58. Applicants submit that the present rejections should be withdrawn for at least the reasons discussed below.

The Previously Filed IDS Materials:

Applicants appreciate the Examiner's acknowledgement of receipt and consideration of the four IDSs filed to date in this matter. Applicants request that the Examiner return signed copies of the PTO-1449 statements showing consideration of these references with the next mailing in this matter.

The Interview Summary:

An Interview Summary of an interview on June 2, 2004 was provided with the Office Action. Applicants note that the Interview Summary fully describes the substance of the interview. Applicants appreciate the Examiner's agreement to enter the preliminary amendment and issue a new Office Action reflecting those claim amendments.

The Section 102 Rejections:

Claims 1-11, 14-16, 19, 20, 27-37, 40-42, 45-48, 51-53, 59 and 69-70 stand rejected under 35 U.S.C. § 102 as being anticipated by United States Patent No. 4,115,665 to Giacoppo *et al.* ("Giacoppo"). Office Action, p.2. Applicants submit that these rejections should be withdrawn at least as Giacoppo fails to disclose a terminal block including both a service wire connection portion and connections to incoming and outgoing communications lines.

Giacoppo describes a multiple circuit interrupter for a telecommunications system that is "designed to facilitate the selective insertion of testers and other ancillary equipment" into telecommunications lines. Giacoppo, Abstract. For the device of Giacoppo, connector jacks are positioned within recesses 4 of bosses 6. Giacoppo, Col. 2, lines 15-20. A jack includes a

base 14 and "two normally contacting conductor springs 13a, 13b." Giacoppo, Col. 2, lines 20-22. Incoming and outgoing lines 12a, 12b are "tied to conductor springs 13a and 13b of respective jacks so as to be normally interconnected thereby." Giacoppo, Col. 2, lines 26-29. Upon insertion of a socket 20 into the recesses 4, the connection between the springs 13a and 13b is interrupted and a connection of each respective spring 13a, 13b to conductors 22a, 22b extending from the socket 20 "to external testing circuits or other monitoring devices" is provided. Giacoppo, Col. 2, lines 35-38.

Thus, Giacoppo discloses only a single connection point and conductors extending therefrom out a back end of the bosses 6 and socket 20, respectively. In contrast, Claim 1 recites various aspects of a connection between a "first connector" and "second connector" and a "service wire connector configured to receive a customer telecommunication conductor" in a "service module." For example, as shown in Figures 4 and 7 of the present application, the base 207 includes a first connector 310 electrically connected to a first conductor 312. The service module 210 includes a service wire connector 522, 542 and contact members 524, 544. A comparison of Figures 8A and 8B illustrates the interaction of the electrical connections when the service module 210 is inserted and removed in connection with respective service wires 808, 810 and telecommunications conductors 800, 802, 804, 806, which may be tip and ring lines extending towards and away from the central office, respectively. As such, while the disclosure of Giacoppo does discuss plugs of a socket 20 breaking a connection between springs 13a and 13b and providing connection of the respective springs to conductors 22a, 22b, such as with the interruptable connection point of Claim 1, it fails to disclose or suggest the other aspects of Claim 1, such as the first and second connector mounted in the base and the service wire connector configured to receive a customer telecommunication conductor. The items 12a, 12b, 22a and 22b of Giacoppo are simply not connectors, nonetheless service wire connectors. Accordingly, the anticipation rejection of Claim 1 and the claims that depend therefrom should be withdrawn for at least these reasons.

The rejection of independent Claim 27 and the claims that depend therefrom should be withdrawn for at least substantially the same reasons. In addition, Claim 27 recites that the

service module is "movably mounted" to the base, rather than "removably mounted." The socket 20 of Giacoppo is removably mounted, not movably mounted. Accordingly, the rejection of Claim 27 and the claims that depend therefrom should also be withdrawn for at least this additional reason.

Independent Claim 51 includes similar particular recitations related to respective conductors and connectors that the Office Action asserts are taught, without reference to any item number, by col. 2, lines 19-38 and Figure 3 of Giacoppo. Office Action, p. 9. As discussed above, Applicants submit that Giacoppo contains no such disclosure. In addition, the Office Action asserts that col. 2, lines 19-38 of Giacoppo discloses the switch and Figure 3 discloses the select module and third connector of Claim 51. Office Action, p. 9. Applicants can find no such teaching. The springs 13a, 13b simply cannot be considered a switch as recited in Claim 51 and the socket 20 cannot be considered the select module. For example, the first and second position of the select module are recited in Claim 51 as both being positioned over the second and third connector. To make this distinction even clearer, Claim 51 has been amended above to recite that, in both positions, the select module is "in the housing." In contrast, the socket 20 must be removed from the boss 6 to allow connection of the springs 13a, 13b. Accordingly, the rejections of Claim 51 and the claims that depend therefrom should also be withdrawn for at least these additional reasons.

Independent Claim 59 includes similar particular recitations related to respective conductors and connectors that the Office Action asserts are taught, without reference to any item number, by col. 2, lines 19-38 and Figure 3 of Giacoppo. Office Action, pp. 10-12. As discussed above, Applicants submit that Giacoppo contains no such disclosure. In addition, the Office Action asserts that col. 2, lines 10-38 and Figure 3 of Giacoppo disclose all the recitations of Claim 59, with almost no identification of what items of Giacoppo allegedly disclose the various recitations of Claim 59. For example, Claim 59 recites "an actuator positioned in the service wire connector member so as to allow the contact member to contact the first conductor in the first position of the service wire connector member and to break the contact between the contact member and the first conductor in the second position of the service wire connector member." Applicants can find nothing in the cited portion or in Figure

3 of Giacoppo disclosing any such actuator. Even were the socket 20 to be considered a "movably mounted service wire connector member" as recited in Claim 59, there is no indication of what aspect of socket 20 discloses the recited: 1) passageway, 2) two positions allowing access to an opening and passing the passageway through an opening in the service wire connector, and 3) an actuator in a service wire connector member as recited in Claim 59. Applicants respectfully submit that the rejection of Claim 59 should also be withdrawn for at least these additional reasons. However, should the rejection be maintained, Applicants respectfully request an identification of what items in Giacoppo are relied on as teaching each of the recitations of Claim 59 and how they teach those recitations.

Independent Claim 69 includes similar particular recitations related to respective conductors and connectors that the Office Action asserts are taught, without reference to any item number, by col. 2, lines 10-38 and Figure 3 of Giacoppo. Office Action, p. 12. As discussed above, Applicants submit that Giacoppo contains no such disclosure. In addition, the Office Action asserts that col. 2, lines 10-38 of Giacoppo discloses the recited "means for electrically connecting a service wire connector" of Claim 69. Office action, p. 12. Again, the Office Action provides no further explanation of how this cited portion provides such a disclosure. In addition, there is no apparent consideration of the corresponding structure for the "means for electrically connecting" of Claim 69 or how Giacoppo discloses the same or a substantially similar structure. Accordingly, the rejection of Claim 69 should also be withdrawn for at least these additional reasons.

Similarly, the rejection of independent Claim 70 fails to consider the corresponding structure for the "means for" recitations included therein. If the rejection is maintained, Applicants respectfully request an identification of the scope applied to these recitations, the items of Giacoppo that allegedly disclose such a structure or a substantially similar structure and how the items of Giacoppo allegedly correspond to such a structure. In particular, the means for connecting in the present application are structures that are configured to provide a connection point to a conductor, such as an insulation displacing connector, while Giacoppo appears to disclose only one connection point with conductive lines extending therefrom. Accordingly, the rejection of Claim 70 should be withdrawn for at least these reasons.

The Section 103 Rejections:

Claims 12, 13, 21, 22, 38, 39, 54, 55 and 60 stand rejected under 35 U.S.C. § 103 as being unpatentable over Giacoppo in view of United States Patent No. 5,704,797 to Myerhoefer *et al.* ("Myerhoefer"). Office Action, p.13. Claims 17, 18, 26, 43, 44, 49, 61-63 and 71-82 stand rejected under 35 U.S.C. § 103 as being unpatentable over Giacoppo in view of United States Patent No. 6,093,050 to Baum *et al.* ("Baum"). Office Action, p.16. Claims 23-25 stand rejected under 35 U.S.C. § 103 as being unpatentable over Giacoppo in view of Myerhoefer and further in view of Baum. Office Action, p.20. Applicants submit that these rejections should be withdrawn for at least the reasons discussed below.

All of the claims rejected as obvious, except Claims 61-63, depend from one of the independent claims discussed above with reference to the Section 102 rejections. Accordingly, each of these dependent claims is patentable at least based on the patentability of the independent claim from which they depend.

Independent Claim 61 stands rejected over Giacoppo and Baum. Office Action, pp. 16-17. Claim 61 has been amended above to clarify that the electrical protection device is "positioned in series between and electrically connecting the first connector and the second connector." In contrast, the surge protector 196 of Baum connects across the tip and ring lines and to a ground electrode 202. Baum, Col. 21, lines 46-60 and Figures 39 and 44. Furthermore, the motivation for the alleged combination is to protect the "service module ... from high voltage or current which will destroy the service module." Office Action, p. 18. However, protection of the socket 20 of Giacoppo is not relevant to the function of the surge protector 196 of Baum, which is intended to protect connected electrical equipment. Accordingly, the Office Action has failed to provide a motivation found in the references themselves for the combination as required to establish a *prima facia* case of obviousness. Thus, the rejections of Claim 61 and the claims that depend therefrom should be withdrawn for at least these reasons. Claim 62 is separately patentable at least as nothing in the cited section of Baum at Col. 3, lines 37-55 appears to teach "the electrical protection device is a fuse circuit" as alleged by the Office Action. Office Action, p. 18.

Applicants further submit that various of the dependent claims are also separately patentable. However, given the lack of particularity in the rejections of the independent claims, nonetheless the dependent claims, Applicants will generally assert that cited portions of Giacoppo and the other cited references appear not to disclose various of the claim recitations to which they are applied. For example, Figure 10 of Meyerhoefer is relied on, without any explanation, other than a conclusory allegation, that the recitations of Claims 13 and 39 are disclosed in Figure 10. Office Action, pp.14-15. Applicants fail to understand the basis for such an assertion, particularly as the interrelationship of the recitations of these claims does not appear to be found in Figure 10, even if bits and pieces of the claims could be addressed alone without considering whether treating one item in Meyerhoefer as disclosing some aspect of the claims would be consistent with the basis for reliance on Meyerhoefer as disclosing another, related, recitation of these claims.

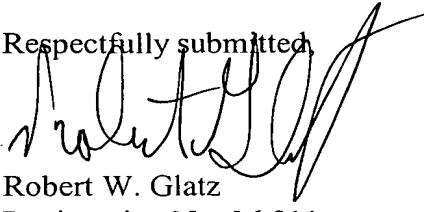
By way of further and more particular example, the Office Action asserts that Meyerhoefer discloses "the second orientation comprises substantially a 180° rotation from the first orientation" recitations of Claim 55. Office Action, p. 16. Applicants fail to understand what feature of Figure 6 of Meyerhoefer contains such a disclosure. For example, if the rejection relies on the rocker arm termination mechanisms 42, Figure 6 clearly does not disclose the 180° rotation of Claim 55. Thus, without further explanation of the basis for the rejections, it is difficult for Applicants to provide a clear explanation of why the references fail to support the allegations of the Office Action.

Conclusion

Applicants respectfully submit that, for the reasons discussed above, the references cited in the present rejections do not disclose or suggest the present invention as claimed. Accordingly, Applicants respectfully request allowance of all the pending claims and passing this application to issue.

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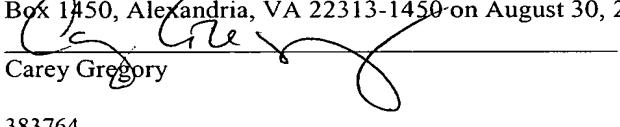
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